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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

FEB 17 2023

SEAN F. McAVOY, CLERK
DEPUTY
SPOKANE, WASHINGTON

8 UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF WASHINGTON

10 UNITED STATES OF AMERICA
11 *ex rel.* Bradley D. Keever, Relator,

12 Plaintiffs,

13 v.
14

15 MISSION SUPPORT ALLIANCE,
16 LLC; HANFORD MISSION
17 INTEGRATION SERVICES, LLC;
18 LEIDOS, INC; LEIDOS
19 INTEGRATED TECHNOLOGY,
20 LLC; CENTERRA GROUP LLC;
21 PARSONS GOVERNMENT
22 SERVICES, INC; LOCKHEED
23 MARTIN CORPORATION;
24 LOCKHEED MARTIN SERVICES,
25 INC; WACKENHUT SERVICES,
26 INC; and JACOBS ENGINEERING
27 GROUP, INC.,

28 Defendants.

No. 4:21-CV-05156-SAB

**FILED *EX PARTE*
AND UNDER SEAL**

UNITED STATES' *EX PARTE*
APPLICATION FOR AN
EXTENSION OF TIME TO
CONSIDER ELECTION TO
INTERVENE

26 The United States of America, by and through the undersigned, respectfully
27 submits this unopposed *Ex Parte* Application, pursuant to 31 U.S.C. § 3730(b)(3),
28 for an extension of six months, from February 15, 2023, to and including August

1 15, 2023, in which to notify the Court of its decision regarding intervention in the
2 above-captioned False Claims Act *qui tam* action, and during which time the *qui*
3 *tam* Complaint and other related filings shall remain under seal. Unless an
4 extension is granted, the United States would be required to elect whether to
5 intervene on February 15, 2023.

6 As set forth in the accompanying Memorandum of Points and Authorities,
7 the United States has been diligently investigating the relator's allegations.
8 However, the United States needs additional time to complete its investigation and
9 evaluation of the relator's claims. The relator, by and through counsel of record,
10 has informed the United States that they concur in this request.

11 Therefore, the United States asks that it be given an additional six months,
12 up to and including August 15, 2023, to complete its investigation and to notify the
13 Court whether it will intervene in this case and during which time the Complaint
14 and other related pleadings should remain under seal.

15 Respectfully submitted this 17th day of February, 2023.

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28

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 17, 2023, a true and correct copy of the foregoing *United States' Unopposed Ex Parte Application for an Extension of Time to Consider Election to Intervene* and the *Proposed Order*, were emailed to counsel for the Relator as follows:

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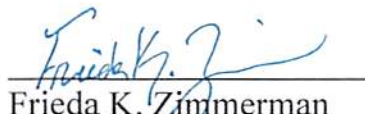
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Because this action is under seal pursuant to 31 U.S.C. §§ 3729, *et seq.*, defendants have not been served with copies of the foregoing Application. Moreover, to preserve the integrity of the United States' ongoing investigation, Relator has been served with copies of the Application and proposed order, but not the Memorandum in support thereof.



Frieda K. Zimmerman

Special Assistant United States Attorney